



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



MAR 26 2012

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**
District Facility # S-1328
Project # S-1120823

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Exxon Mobil Corporation is proposing a Title V minor permit modification to incorporate the recently issued ATC S-1328-58-2 into the Title V operating permit. The project is to remove the voluntary tank inspection and maintenance (I &M) and cleaning conditions.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC S-1328-58-2, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



MAR 26 2012

Greg C. Manuel
Exxon Mobil Corporation
Corp-MI-3041, P O Box 4358
Houston, TX 77210-1358

**Re: Notice of Minor Title V Permit Modification
District Facility # S-1328
Project # S-1120823**

Dear Mr. Manuel:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued ATC S-1328-58-2 into the Title V operating permit. The project is to remove the voluntary tank inspection and maintenance (I &M) and cleaning conditions.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC S-1328-58-2, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,


David Warner
Director of Permit Services

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www.healthyliving.com

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1120823

Date: 3/20/2012
Engineer: Dolores Gough
Lead Engineer: Allan Phillips *AP Supt A QIE*
MAR 20 2012

Facility Number: S-1120823
Facility Name: Exxon Mobil Corporation
Mailing Address: Corp-MI-3041, P.O. Box 4358
Houston, TX 77210-1358

Contact Name: Greg C. Manuel
Phone: 805-961-4066

Responsible Official: Greg C. Manuel
Title: Sr. Field Superintendent, CA Operations

I. PROPOSAL

Exxon Mobil is proposing a Title V minor permit modification to incorporate the recently issued ATC S-1328-58-2 into the Title V operating permit. The project is to remove the voluntary tank inspection & maintenance (I&M) and cleaning conditions.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

The equipment is located at ExxonMobil's Heavy Oil Western stationary source – Hill lease, South Belridge field in Section 19, T28S, R21E.

III. EQUIPMENT DESCRIPTION

S-1328-58-2: WEMCO INDUCED GAS FLOATATION UNIT MODEL 84X, WITH 61 HP MOTOR CONNECTED TO TEOR VAPOR CONTROL SYSTEM LISTED IN S-1328-7 (HILL LEASE)

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Exxon Mobil proposed to remove the voluntary tank inspection and maintenance (I & M) and cleaning conditions. This modification will not result in an increase in emissions.

Proposed PTO vs ATC:

Condition #1 on the subject ATC was removed as this condition required submittal of an application to modify the Title V permit, which has already been satisfied with this permit action.

Proposed PTOs vs current PTOs:

Conditions #9 through 15 on the current PTO were removed as these conditions pertain to the voluntary tank I & M and cleaning.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which

the source would otherwise be subject. Such terms and conditions include;

- a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
 6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. S-1328-58-3
- B. Authority to Construct No. S-1328-58-2
- C. Application
- D. Previous Title V Operating Permit No.'s S-1328-58-1

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
S-1328-58-3

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1328-58-3

EXPIRATION DATE: 03/31/2016

SECTION: NE19 **TOWNSHIP:** 28S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

WEMCO MODEL 84X INDUCED GAS FLOATATION UNIT, WITH 61 HP MOTOR CONNECTED TO THE TEOR VAPOR CONTROL SYSTEM LISTED IN S-1328-7 (HILL LEASE):

PERMIT UNIT REQUIREMENTS

1. Volatile organic compounds (VOC) emissions shall not exceed 0.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Vessel shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from vessel and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. Vessel shall be designed and maintained to vent only to vapor control system S-1328-7. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument in accordance with procedures in EPA Test Method 21. A liquid Leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. A reading in excess of 10,000 ppmv above background is a violation of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Any gauging or sampling device shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2C: Oil and Gas Production Screening Value Ranges (<10,000 ppmv) Emission Factors with 100% VOC content in components. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The efficiency of any VOC destruction device shall be measured by EPA Method 25, 25a, or 25b. [District Rule 4623] Federally Enforceable Through Title V Permit
10. Except as otherwise provided in this permit, operator shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rules 4623 and 2201] Federally Enforceable Through Title V Permit
11. Permittee shall maintain accurate records of fugitive emissions and such records shall be made readily available for District inspection upon request for a period of five years. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT B

Authority to Construct No. S-1328-58-2



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1328-58-2

ISSUANCE DATE: 01/30/2012

LEGAL OWNER OR OPERATOR: EXXON MOBIL CORPORATION
MAILING ADDRESS: CORP-MI-3049

P O BOX 4358
HOUSTON, TX 77210-4358

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: NE19 **TOWNSHIP:** 28S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF WEMCO INDUCED GAS FLOATATION UNIT MODEL 84X, WITH 61 HP MOTOR CONNECTED TO TEOR VAPOR CONTROL SYSTEM LISTED IN S-1328-7 (HILL LEASE): REMOVE VOLUNTARY TANK I & M AND CLEANING CONDITIONS

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Volatile organic compounds (VOC) emissions shall not exceed 0.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Vessel shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from vessel and a VOC control device. The vapor control system shall be APCO-approved and maintained in leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. Vessel shall be designed and maintained to vent only to vapor control system S-1328-7. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument in accordance with procedures in EPA Test Method 21. A liquid Leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. A reading in excess of 10,000 ppmv above background is a violation of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. Any gauging or sampling device shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2C: Oil and Gas Production Screening Value Ranges (<10,000 ppmv) Emission Factors with 100% VOC content in components. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The efficiency of any VOC destruction device shall be measured by EPA Method 25, 25a, or 25b. [District Rule 4623] Federally Enforceable Through Title V Permit
11. Except as otherwise provided in this permit, operator shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rules 4623 and 2201] Federally Enforceable Through Title V Permit
12. Permittee shall maintain accurate records of fugitive emissions and such records shall be made readily available for District inspection upon request for a period of five years. [District Rule 2201] Federally Enforceable Through Title V Permit

ATTACHMENT C

Application

S-1328-58-3

San Joaquin Valley Air Pollution Control District

www.valleyair.org


RECEIVED

MAR 15 2012

SJVAPCD
Southern Region

Permit Application For:

[X] ADMINISTRATIVE AMENDMENT [] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO:		EXXON MOBIL CORPORATION	ATTENTION: Todd Griffith, Regulatory Compliance Supervisor
2. MAILING ADDRESS:			
STREET/P.O. BOX: <u>CORP-MI-3041, P.O. Box 4358</u>			
CITY: <u>HOUSTON</u>		STATE: <u>TX</u>	9-DIGIT ZIP CODE: <u>77210-1358</u>
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:			INSTALLATION DATE: N/A
STREET: <u>HILL PROPERTY</u>			CITY: <u>MCKITTRICK</u>
SECTION <u>19</u> TOWNSHIP <u>28S</u> RANGE <u>21E</u>			
4. GENERAL NATURE OF BUSINESS: CRUDE OIL PRODUCTION			
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)			
S-1328-58-: MODIFICATION OF WEMCO INDUCED GAS FLOTATION UNIT MODEL 84X, WITH 61 HP MOTOR CONNECTED TO TEOR VAPOR CONTROL SYSTEM LISTED IN S-1328-7 (HILL LEASE); REMOVE VOLUNTARY TANK I & M AND CLEANING CONDITIONS.			
6. TYPE OR PRINT NAME OF APPLICANT:			TITLE OF APPLICANT:
Greg C. Manuel			California Operations (SYU & Hill) Senior Field Superintendent
7. SIGNATURE OF APPLICANT:		DATE:	PHONE: (805) 961-4066 FAX: (805) 961-4079 EMAIL: greg.c.manuel@exxonmobil.com
		3/13/12	

For APCD Use Only:

EnviroTech

DATE STAMP	FILING FEE RECEIVED: <u>\$ 19-</u>	CHECK#: <u>3706</u>
	DATE PAID: <u>pm 3/15/12</u>	
	PROJECT NO: <u>S1120823</u>	FACILITY ID: <u>S-1328</u>

**San Joaquin Valley
Unified Air Pollution Control District**

RECEIVED
MAR 15 2012
SJVAPCD
Southern Region

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

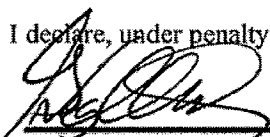
- ☐ SIGNIFICANT PERMIT MODIFICATION ☒ ADMINISTRATIVE
☐ MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: EXXONMOBIL PRODUCTION COMPANY	FACILITY ID: S-1328
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: EXXONMOBIL PRODUCTION COMPANY	
3. Agent to the Owner: GREG C. MANUEL	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- GM* ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- GM* ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- GM* ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- GM* ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official

3/13/12

Date

GREG C. MANUEL

Name of Responsible Official (please print)

CALIFORNINA OPERATIONS (SYU & Hill)
SENIOR FIELD SUPERINTENDENT

Title of Responsible Official (please print)

ATTACHMENT D

Previous Title V Operating Permit No.
S-1328-58-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1328-58-1

EXPIRATION DATE: 03/31/2016

SECTION: NE19 **TOWNSHIP:** 28S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

WEMCO MODEL 84X INDUCED GAS FLOATATION UNIT, WITH 61 HP MOTOR CONNECTED TO THE TEOR VAPOR CONTROL SYSTEM LISTED IN S-1328-7 (HILL LEASE)

PERMIT UNIT REQUIREMENTS

1. Volatile organic compounds (VOC) emissions shall not exceed 0.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Vessel shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from vessel and a VOC control device. The vapor control system shall be APCO-approved and maintained in gas-tight condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. Vessel shall be designed and maintained to vent only to vapor control system S-1328-7. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. A reading in excess of 10,000 ppmv above background is a violation of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Any gauging or sampling device shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2C: Oil and Gas Production Screening Value Ranges (<10,000 ppmv) Emission Factors with 100% VOC content in components. [District Rule 2201] Federally Enforceable Through Title V Permit
- × 9. All piping, fittings, and valves on this vessel shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
- × 10. If any of the vessel components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

11. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) eliminate or minimize the leak within 8 hours after detection, (b) if the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices and eliminate the leak within 48 hours after detection. In no event shall the total time to minimize and eliminate the leak exceed 56 hours after detection. [District Rule 4623, 5.7 9 (Table 3)] Federally Enforceable Through Title V Permit
12. If a component type for a given vessel is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the vessel or vessel system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
13. Operator shall maintain an inspection log containing the following: 1) type of component leaking; 2) date and time of leak detection, and method of detection; 3) date and time of leak repair, and emission level of recheck after leak is repaired; 4) method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 1070] Federally Enforceable Through Title V Permit
14. The efficiency of any VOC destruction device shall be measured by EPA Method 25, 25a, or 25b. [District Rule 4623, 6.4.7] Federally Enforceable Through Title V Permit
15. Except as otherwise provided in this permit, operator shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rules 4623 and 2201] Federally Enforceable Through Title V Permit
16. Permittee shall maintain accurate records of fugitive emissions and such records shall be made readily available for District inspection upon request for a period of five years. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.